

August 28, 2003

Dear Secretary Dorte,

Subject: Comments for Amendment of Part 97 the Commission's
Amateur Service Rules.

I fully support the immediate elimination of the code testing
proficiency requirement of the Amateur Service Rules.

Morse code proficiency is not an indication of a quality radio
operator. I have demonstrated my electronic abilities, having
successfully passed both Element 2 and Element 3. Unfortunately
passing Element 1 still eludes me, but not for lack of trying.
I have many hundreds of practice hours listening to, and copying
Morse code. Yet I still fail the examination every time I've tried.

In the past the FCC cited the International Treaty requirement
as the reason the five word per minute Morse code test couldn't
be waived. This is no longer the case, as the ITU has released
the United States of America from that requirement.

On July 29, 2003 a petition for rule making (assigned RM-10787)
was submitted by the National Conference of Volunteer Examiner
Coordinators. This petition makes a lot of sense to me, I am
supporting their proposal as written.

As you know, many countries from around the world have already
eliminated the Morse code proficiency examinations from their
Amateur Radio Service Rules or they are in the process.

When the Amateur Service Rules were first established decades ago
it made sense to require that Radio Operators demonstrate their
code proficiency. However in the 21st Century computer/digital age,
it no longer has a place, other than in our history books.
We have evolved from requiring our math students be proficient in
the use of the abacus, and the slide rule.

Let us now drop the Morse code requirement from the Amateur Service
Rules as quickly as possible.

The fact that continuous wave emission is only one-of-hundreds of
different types of emission now in use. Citizens of the United
States of America shouldn't be penalized and prohibited from
operating voice emissions on the HF bands while our Ham Buddies
around the world are enjoying the privilege.

Sincerely Yours,
Gaylon D. Overton KC0PQA